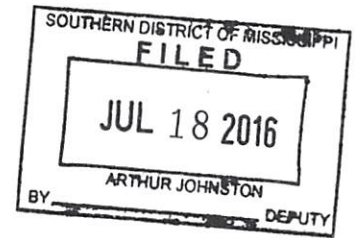


IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION



ANNIE FIGURES

PLAINTIFF

VS.

CIVIL ACTION NO. 3:16-cv-563 HTW-LRA

HOUSING AUTHORITY OF  
THE CITY OF JACKSON (JHA)  
AND GOLDEN KEY APARTMENT  
ASSOCIATES ET AL.

DEFENDANT(S)

COMPLAINT

COMES NOW, plaintiff, Annie Figures, pro se, and for cause of action against the defendant(s), Housing Authority of the City of Jackson and Golden Key Apartment Associates, would state that file this lawsuit seeks relief from the above named Defendants' violations of the Fair Housing Act, Plaintiff's civil rights, breach of the lease agreement, illegal eviction, retaliation, slanders, fraud in Tenants' council elections, and failure to pay utility allowances and fees.

I. JURISDICTION

Jurisdiction under the Fair Housing Act, 42 U.S.C section 3601 et. seq., is why this matter is being brought in federal court. Plaintiff is an adult resident citizen of the County of Hinds, State of Mississippi. The defendant Housing Authority of the City of Jackson (JHA) and Golden Key Associates reside in the County of Hinds, State of Mississippi.

## **II. FACTS**

Plaintiff, Annie Figures, resided more than 12 years at the 3430 Albermarle Road, Apt 205, Jackson, MS 39213 location. At some point she was elected the Tenant Council president. As a result thereof Ms. Annie Figures constantly spoke up for the best interest, safety, health, and well-being of the tenants as a whole to and before Golden Key Apartment Association and the Housing Authority of the city of Jackson.

The Housing Authority of the city of Jackson, and Golden Key Apartment Association did constantly sought to stop Ms. Annie Figures of bringing attentions to the health, safety, and unfair treatments of concerns of the tenants. As a direct result thereof Golden Key Apartment Association and the Housing Authority of the city of Jackson did retaliate upon Ms. Annie Figures by Golden Key Apartment Association and the Housing Authority of the city of Jackson representatives did threatened, coerced, and intimidated two tenants to go along with Golden Key Apartment Association and the Housing Authority of the city of Jackson representatives' allegations that Ms. Annie Figures had threatened bodily harm to a male and female tenant. These allegations are false and have never been proven by the defendants of being true before any court, criminal nor civil.

Nevertheless, Ms. Annie Figures was evicted and locked out of her apartment once on July 17, 2015 then again on August 18, 2015, and finally on August 31, 2015 removal and September 04, 2015 illegal ban.

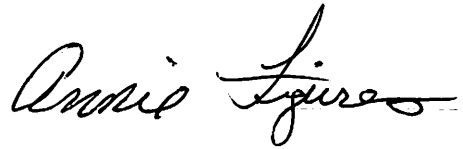
## **RELIEF**

I, Annie Figures, pray that the court will grant a full trial by a jury; whereby such relief be granted such as reversal of Golden Key Apartment Association and the Housing Authority of

the city of Jackson's criminal ban of my name and reputation. I, Annie Figures, also seek \$250,000.00 in punitive damages, actual damages, mental pain, suffering, and humiliations of \$250,000.00. I also seek a HUD voucher for safe secure housing for my age and disabilities. Also, I request that the court would appoint an attorney as allowed under the Fair Housing Act for reasons of the allegations of threat of harm and safety or health of others, attorney fees, and court costs.

Thank You,

Respectfully submitted, this the 18<sup>th</sup> day of July, 2016.

A handwritten signature in cursive script that reads "Annie Figures".

Annie Figures, PRO SE

Annie Figures  
110 South Green Avenue, Apt 3  
Jackson, MS 39203  
601-622-6644